

EXHIBIT 2

From: [Jacob S. Frenkel](#)
To: [Staren, Devon](#); [Aimee R. Gibbs](#); [Seth B. Waxman](#)
Cc: [Grossman, Drew](#); [Maher, Daniel](#)
Subject: RE: EXTERNAL: FW: SEC v. Vuuzle
Date: Wednesday, July 21, 2021 5:28:38 PM

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I am informed that counsel providing non-litigation advice is George SK, Partner, Fotis International Law Firm, Creative Tower, PO Box 4422, Fujairah, United Arab Emirates, +971 56 129 8984. Mr. SK's e-mail address is george@fotislaw.com.

If, as is the case with many, he observes the Muslim holidays and traditions, please be aware that they're in Eid al-Adha which translates as "Festival of Sacrifice." Eid al-Adha is known as "Big Eid" by some Muslim worshippers and considered holier than Eid al-Fitr. That's the extent of my knowledge about Eid al-Adha. I'm much more fluent in my knowledge of the origins, practices and observances around the Jewish holidays.

Also, with respect to the letter that you shared, my understanding is that no entity has transferred tokens to persons who invested in Defendant-Vuuzle. Instead, Mr. Flynn personally gifted tokens from a corpus of tokens that he owns to persons who are shareholders of Defendant-Vuuzle. As we are not corporate counsel and have not advised regarding the token transactions that the Staff has referenced, please do not consider my response as an opinion regarding whether or if personally-gifted token transactions, whether promised or made, do or do not fall within the federal securities laws

Jacob S. Frenkel

Member

Chair, Government Investigations and Securities Enforcement Practice

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Admitted to practice in Maryland and Louisiana. Not admitted to practice in the District of Columbia.

From: Staren, Devon <StarenD@sec.gov>

Sent: Tuesday, July 20, 2021 3:06 PM

To: Jacob S. Frenkel <JFrenkel@dickinson-wright.com>; Aimee R. Gibbs <AGibbs@dickinson-wright.com>; Seth B. Waxman <SWaxman@dickinson-wright.com>

Cc: Grossman, Drew <grossmandr@SEC.GOV>; Maher, Daniel <MaherD@SEC.GOV>

Subject: RE: EXTERNAL: FW: SEC v. Vuuzle

Thank you Jacob. Can you tell me, who is Vuuzle's corporate securities counsel?

From: Jacob S. Frenkel <JFrenkel@dickinson-wright.com>

Sent: Tuesday, July 20, 2021 7:54 AM

To: Staren, Devon <StarenD@sec.gov>; Aimee R. Gibbs <AGibbs@dickinson-wright.com>; Seth B. Waxman <SWaxman@dickinson-wright.com>

Cc: Grossman, Drew <grossmandr@SEC.GOV>; Maher, Daniel <MaherD@SEC.GOV>

Subject: RE: EXTERNAL: FW: SEC v. Vuuzle

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Good morning, Devon,



This firm's representation of Vuuzle is limited to defense of the Commission's investigation. I have forwarded your correspondence and requested to speak with Vuuzle's corporate securities counsel regarding the matter. Vuuzle does have separate corporate securities counsel, and that counsel is not now nor has been associated with this firm.

Jacob

Jacob S. Frenkel

Member

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TENNESSEE TEXAS WASHINGTON D.C. TORONTO

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From: Staren, Devon <StarenD@sec.gov>

Sent: Monday, July 19, 2021 1:04 PM

To: Jacob S. Frenkel <JFrenkel@dickinson-wright.com>; Aimee R. Gibbs <AGibbs@dickinson-wright.com>; Seth B. Waxman <SWaxman@dickinson-wright.com>

Cc: Grossman, Drew <grossmandr@SEC.GOV>; Maher, Daniel <MaherD@SEC.GOV>

Subject: EXTERNAL: FW: SEC v. Vuuzle

Counsel,

We have not heard back from you on this earlier email. It appears that Vuuzle is continuing to send problematic emails to investors in what appears to be a new unregistered and potentially fraudulent offering of securities – this time, in the form of tokens. Once again, we want to bring this to your attention and ask you for any additional information on this and similar communications that are being sent to current Vuuzle investors. As mentioned earlier, this look like additional misconduct and we continue to reserve our right to bring this to the Court’s attention if it continues.

I am happy to discuss further if you would like.

Thanks,
Devon Staren

From: Staren, Devon
Sent: Tuesday, July 06, 2021 2:35 PM
To: Jacob S. Frenkel (jfrenkel@dickinson-wright.com) <jfrenkel@dickinson-wright.com>; Aimee R. Gibbs <AGibbs@dickinson-wright.com>; Seth B. Waxman <SWaxman@dickinson-wright.com>
Cc: Grossman, Drew <grossmandr@SEC.GOV>; Maher, Daniel <MaherD@SEC.GOV>
Subject: SEC v. Vuuzle

Counsel,

Last week, we learned that several existing Vuuzle investors were emailed a link to this purported “investment agreement,” along with a message that investors had 5 days to sign it or they would unilaterally be deemed by Vuuzle to have agreed to its terms. We are bringing this to your attention because there are several problematic provisions within this document, including requiring investors to represent they conducted due diligence on the company prior to investing and an agreement to provide assistance to Ronald Flynn (the Founder) in proceedings before any “Relevant Authority.”

We do not know whether you were aware of this investor communication. If you have any additional information, please let us know. However, please note that, in our view, this looks like misconduct and we reserve our right to bring this to the Court’s attention if it continues.

I am happy to discuss further if you would like.

Thanks,
Devon

Devon Leppink Staren
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